

Paul Bergsøes Vej 6
2600 Glostrup

Magnoliavej 2-4
5250 Odense SV

Telefon 4343 6000
teknig@teknig.dk
www.teknig.dk

Mobil: 6043 5767
Email: mri@teknig.dk

Dato: 15. juli 2020

Side 1/2

Høringssvar på Commission implementing regulation on detailing the technical modalities for the effective implementation of an optional common Union Scheme for rating the smart readiness of buildings

TEKNIQ Arbejdsgiverne, the association representing 4.300 mechanical and electrical contractors in the electrical, plumbing, heating, ventilation and metals industries in Denmark, welcomes the initiative on smart readiness indicator scheme (SRI) as digitalisation and modernisation of buildings and the building installations play an active role in achieving energy efficiency in buildings and as part of giving flexibility in the energy system.

It is important that the SRI experts are well qualified within the fields of the technical domains listed in Annex IV. We notice that according to Article 3 member states can decide that experts accredited or qualified for energy performance certificate are also competent to issuing smart readiness indicator certificates. We suggest that its mandatory for member states to set additional requirements on competence criteria for these experts regarding building installations and building control systems as these qualifications are important to achieve a correct and useful SRI.

We welcome that the SRI will supplement the EPBD and give information on perspectives of new technologies in buildings. However, we notice that the content of the SRI listed in Annex IX does not include recommendations to the building owner on how to improve the smart readiness of the building and furthermore that scores of each technical domain is optionally. We are concerned that this will devalue the SRI as it will make the actions needed to improve the smart readiness of the building unclear to the building owner and communications with installers and other energy service companies will not be assisted by the scheme.

The potential for heat savings by intelligent management is estimated in Denmark to be approx. 8%, while for Trade & Service it is estimated to be

TEKNIQ ARBEJDSGIVERNE

14%. In practice, the effect will largely depend on how the control technologies are used and on the settings of controls etc. In order to achieve the expected energy savings and CO2 reductions, it is essential that, in addition to proper installation, intelligent building installations are regularly serviced to ensure that the installations function and as expected.

Paul Bergsøes Vej 6
2600 Glostrup

Magnoliavej 2-4
5250 Odense SV

Telefon 4343 6000
teknig@teknig.dk
www.teknig.dk

Mobil: 6043 5767
Email: mri@teknig.dk

Dato: 15. juli 2020

Side 2/2